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Attorneys for AD HOC CALIFORNIA
PUBLIC ENTITIES COMMITTEE

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors,

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**AMENDED VERIFIED
STATEMENT OF THE AD HOC
CALIFORNIA PUBLIC ENTITIES
COMMITTEE PURSUANT TO
BANKRUPTCY RULE 2019**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects Both

*All papers shall be filed in the Lead
Case, 19-30088 (DM)

1 Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the
2 “Bankruptcy Rules”) the Ad Hoc California Public Entities Committee (the “Ad
3 Hoc Committee”), composed of the California counties listed in Exhibit 1, and
4 having claims as public entities against PG&E Corporation and Pacific Gas and
5 Electric Company (the “Debtors”) more fully described in Exhibit 1, by and
6 through its undersigned counsel, hereby submits this amended verified statement
7 (“Amended Verified Statement”), and in support thereof, states as follows:

8 1. In January, 2019, the California County Counsel Association, which
9 monitors developments in the law and new cases which affect the interests of
10 California counties, formed the Ad Hoc Committee. On March 22, 2019, the Ad
11 Hoc Committee engaged Lamb & Kawakami LLP (“L&K”) to represent it in
12 connection with these chapter 11 cases. Individual members of the Ad Hoc
13 Committee joined the committee and engaged L&K on various dates due, in part,
14 to the fact that public entities require approval of boards or other governmental
15 bodies to retain counsel. This Amended Verified Statement is filed because
16 additional entities have become members of the Ad Hoc Committee.

17 2. As of the date of this Amended Verified Statement, L&K represents
18 only the Ad Hoc Committee and certain individual municipal entities. L&K does
19 not represent or purport to represent any other entities in connection with the
20 Debtors’ chapter 11 cases and does not undertake to represent the interest of, and
21 are not fiduciaries to any other entities other than those identified above. Each
22 member of the Ad Hoc Committee is aware of and has consented to the L&K
23 group representation. Members of the AD Hoc Committee do not represent or
24 purport to represent any other entities in connection with the Debtors’ chapter 11
25 cases, but are public entities that provide services to the public within their
26 jurisdictions.

27 3. The members of the Ad Hoc Committee have claims of various types
28 arising from their relationship with the Debtors as public entities. Pursuant to

1 Bankruptcy Rule 2019, a list of names, addresses and the disclosable economic
2 interests of members in relation to the Debtors as of October 30, 2019, is attached
3 as Exhibit 1. The Ad Hoc Committee members hold numerous and varied types of
4 economic interests in relation to the Debtors including claims of the kinds more
5 fully described in Exhibit 1.

6 4. The information set forth in Exhibit 1, which has been reviewed and
7 approved by the Ad Hoc Committee, is intended only to comply with Bankruptcy
8 Rule 2019 and is not intended for any other purpose. L&K does not make any
9 representation regarding the validity, amount, allowance, or priority of such
10 economic interests and reserves all rights with respect thereto.

11 5. There is no written instrument which authorizes the Ad Hoc
12 Committee to act. The Ad Hoc Committee has acted and will continue to act with
13 the consent of its members.

14 6. Nothing contained in the Amended Verified Statement or Exhibit 1
15 should be construed as a limitation on, or waiver of, any rights of any member of
16 the Ad Hoc Committee to assert, file and/or amend their claims in accordance with
17 applicable law and any orders entered in these chapter 11 cases.

18 7. The Ad Hoc Committee does not, by filing this Amended Verified
19 Statement nor any subsequent appearance, pleading, claim or suit, submit to the
20 jurisdiction of the Bankruptcy Court or intend that this Amended Verified
21 Statement constitute a waiver of any of its rights: (i) to have final orders in core
22 and non-core matters entered only after de novo review by a District Judge; (ii) to
23 have any final order entered by, or other exercise of the judicial power of the
24 United States performed by, an Article III court; (iii) to trial by jury in any
25 proceeding so triable in these cases, or any controversy or proceeding related to
26 these cases; (iv) to have the reference withdrawn by the District Court in any
27 matter subject to mandatory or discretionary withdrawal; (v) to any objection to the
28 jurisdiction of the Bankruptcy Court; or (vi) to assert any other rights, claims,

1 actions, defenses, setoffs or recoupments to which the Ad Hoc Committee is or
2 may be entitled, in law or in equity, all of which rights, claims, actions, defenses,
3 setoffs and recoupments the Ad Hoc Committee expressly reserves.

4 8. L&K reserves the right to amend and/or supplement this Amended
5 Verified Statement in accordance with the requirements of Bankruptcy Rule 2019.

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7 DATED: November 4, 2019

Respectfully submitted,

8 LAMB & KAWAKAMI LLP
9 MICHAEL K. SLATTERY
10 THOMAS G. KELCH

11 By: /s/ Michael K. Slattery
12 Michael K. Slattery
13 Attorneys for the Ad Hoc California
14 Public Entities Committee
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EXHIBIT 1

Names and Addresses of Committee Members

Member Name	Address	Disclosable Economic Interest
County of San Luis Obispo	1055 Monterey Street Ste. D320 San Luis Obispo, CA 93408	General Claims ⁱ
County of Sonoma	575 Administration Drive Room 105-A Santa Rosa, CA 95403	General Claims Wildfire Claims ⁱⁱ
County of Marin	3501 Civic Center Drive Ste. 275 San Rafael, CA 94903	General Claims
County of Calaveras	891 Mountain Ranch Road San Andreas, CA 95249	General Claims
County of Monterey	168 West Alisal Street, 3 rd fl. Salinas, CA 93901	General Claims
County of San Benito	Office of the County Counsel, 481 4th St. Fl. 2 Hollister, CA 95023-3840	General Claims
County of San Joaquin	44 North San Joaquin Street Sixth Floor, Suite 679 Stockton, CA 95202	General Claims
County of Tulare	2900 W. Burrel Avenue Visalia, CA 93291	General Claims
County of Fresno	2220 Tulare St, Fifth Floor Fresno, CA 93721	General Claims
County of Mariposa	5100 Bullion Street, 2nd fl. Mariposa, CA 95338	General Claims
County of Tuolumne	2 S. Green Street Sonora, CA 95370	General Claims

Member Name	Address	Disclosable Economic Interest
County of Yolo	625 Court St., Ste. 201 Woodland, CA 95695	General Claims
County of Alameda	1221 Oak Street, Suite 450 Oakland, CA 94612	General Claims
County of Madera	200 West 4th St Madera, CA 93637	General Claims
County of El Dorado	330 Fair Lane Placerville, CA 95667	General Claims
County of Stanislaus	1010 10 th St., #6400 Modesto, CA 95354	General Claims
County of El Dorado	330 Fair Lane Placerville, CA 95667	General Claims
County of Santa Cruz	701 Ocean Street, Room 505 Santa Cruz, CA 95060	General Claims

ⁱ The economic interests of members of the Committee include several types of existing and potential claims against PG&E described below. These claims vary from member to member of the Committee. The types of claims the members generally hold or may hold include (these claims are referred to as "General Claims"):

- a. Claims for real property taxes, franchise fees, and utility users' taxes collected by PG&E;
- b. Claims for damage to public property from PG&E's operations;
- c. Claims for failure to restore public property after excavation of public property to service PG&E's underground facilities;
- d. Claims for performance of obligations to move utility lines underground pursuant to Public Utilities Commission Rule 20 A;
- e. Claims arising from breach of contract between PG&E and a particular member;
- f. Claims for failure to perform obligations under state or federal law, including obligations to make monetary payments;
- g. Breach of obligations to provide electric power and natural gas to public facilities operated by the members;
- h. Claims resulting from power outages, including outages resulting from de-energization decisions made by the Debtors;
- i. Claims for reductions in the tax base of members resulting from wildfires caused by the Debtors;
- j. Claims for indemnity for any obligations paid by members as a result of any failure of performance, default or other harm caused by PG&E.

In addition to General Claims, members hold or may hold claims of the following kinds (these claims are referred to as "Wildfire Claims"):

- a. Damage to public services and infrastructure including public buildings, revenue generating public assets and services, roads, bridges, sidewalks, culverts, drains, storm and water systems (both damage to and contamination of such systems), traffic lights, stop signs, public landscaping, art, lost capacities in reservoirs, water storage and landfills;
- b. Increased costs from workers' compensation claims and overtime, and from increased use of and need for law enforcement, emergency response personnel, and other public safety services;
- c. Other damages that have or may in the future result from wildfires caused by the debtors;

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d. Claims for indemnity for any payments made by members as a result of any damage caused by wild fires.
ⁱⁱ See definition in Endnote i above.